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Attorneys for Defendant California Physicians' Service
dba Blue Shield of California

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., et al.,

Debtors and Debtors In Possession.

Affects:

- ☐ All Debtors
- ☐ Verity Health System of California, Inc.
☒ O'Connor Hospital
☒ Saint Louise Regional Hospital
☐ St. Francis Medical Center
☒ St. Vincent Medical Center
☒ Seton Medical Center
☐ O'Connor Hospital Foundation
☐ Saint Louise Regional Hospital Foundation
☐ St. Francis Medical Center of Lynwood
Foundation
☐ St. Vincent Foundation
☐ St. Vincent Dialysis Center, Inc.
☐ Seton Medical Center Foundation
☐ Verity Business Services
☐ Verity Medical Foundation
☐ Verity Holdings, LLC
☐ De Paul Ventures, LLC
☐ De Paul Ventures - San Jose Dialysis, LLC

Debtors and Debtors In Possession.

Lead Case No. 2:18-bk-20151-ER

Jointly Administered With:
Case No.: 2:18-bk-20162-ER
Case No.: 2:18-bk-20163-ER
Case No.: 2:18-bk-20164-ER
Case No.: 2:18-bk-20165-ER
Case No.: 2:18-bk-20167-ER
Case No.: 2:18-bk-20168-ER
Case No.: 2:18-bk-20169-ER
Case No.: 2:18-bk-20171-ER
Case No.: 2:18-bk-20172-ER
Case No.: 2:18-bk-20173-ER
Case No.: 2:18-bk-20175-ER
Case No.: 2:18-bk-20176-ER
Case No.: 2:18-bk-20178-ER
Case No.: 2:18-bk-20179-ER
Case No.: 2:18-bk-20180-ER
Case No.: 2:18-bk-20181-ER

Chapter 11 Cases

Adv. No. 2:20-ap-01575-ER

**Stipulation between Plaintiffs and Blue
Shield of California to Extend Response
Date to Complaint**

Status Conference Date and Time:

Date: November 17, 2020

Time: 10:00 a.m.

Courtroom: 1568

Address: 255 East Temple Street
Los Angeles, CA 90012

ST. VINCENT MEDICAL CENTER, a
California nonprofit public benefit corporation,
SETON MEDICAL CENTER, a California
nonprofit public benefit corporation,
O’CONNOR HOSPITAL, a California
nonprofit public benefit corporation, and
SAINT LOUISE REGIONAL HOSPITAL, a
California nonprofit public benefit corporation,

Plaintiffs,

v.

CALIFORNIA PHYSICIANS’ SERVICE dba
BLUE SHIELD OF CALIFORNIA, a
California nonprofit public benefit corporation,

Defendant.

California Physicians’ Service dba Blue Shield of California (“Blue Shield”), defendant in the above-captioned adversary proceeding (the “Adversary Proceeding”), and plaintiffs St. Vincent Medical Center (“St. Vincent”), Seton Medical Center (“Seton”), O’Connor Hospital (“O’Connor”) and Saint Louise Regional Hospital (“Saint Louise”) (St. Vincent, Seton, O’Connor and Saint Louise are referred to collectively as the “Plaintiffs” and Blue Shield and the Plaintiffs are referred to collectively as the “Parties”), by and through undersigned counsel, hereby stipulate (the “Stipulation”) and agree to extend Blue Shield’s deadline to respond to the complaint in this Adversary Proceeding. In support of this Stipulation, the Parties state as follows:

RECITALS

A. Plaintiffs initiated this Adversary Proceeding on August 28, 2020, with the filing of a Complaint for Breach of Contracts, Turnover, Unjust Enrichment, and Damages for Violation of the Automatic Stay (“Complaint”) against Blue Shield.

B. On August 31, 2020, the Clerk of Court issued the Summons and Notice of Status Conference in Adversary Proceeding (“Summons”), which provided a deadline of September 30, 2020, for Blue Shield to respond to the Complaint, and provide notice of a status conference scheduled for November 17, 2020, at 10:00 a.m.

C. On September 1, 2020, Plaintiffs served the Summons and Complaint.

1 D. Blue Shield has requested additional time to respond to the Complaint.

2 E. The Parties agree to an extension of time for Blue Shield to respond to the
3 Complaint through and including October 30, 2020.

4 **STIPULATION**

5 **NOW, THEREFORE**, the Parties hereby agree and stipulate that, subject to the approval
6 of the Court:

7 1. Blue Shield's deadline to respond to the Complaint is extended through and
8 including **October 30, 2020**.

9 2. This Stipulation may be executed in multiple counterparts each of which will
10 constitute an original and all of which together will constitute one and the same agreement.
11 Facsimile or PDF signatures shall be considered original signatures for all purposes.

12
13 Respectfully Submitted,

14 Dated: September 28, 2020

15 SNELL & WILMER L.L.P.

16
17 By: /s/ Michael B. Reynolds

18 Michael B. Reynolds

19 Andrew B. Still

20 Attorneys for Defendant
California Physician Service dba
Blue Shield of California

21 Dated: September 28, 2020

22 PACHULSKI STANG ZIEHL & JONES LLP

23
24 By: 

25 Steven J. Kahn

26 Attorneys for Plaintiffs St. Vincent Medical
Center, Seton Medical Center, O'Connor
Hospital, and Saint Louise Regional Hospital

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
600 Anton Boulevard, Suite 1400, Costa Mesa, CA 92626-7689.

A true and correct copy of the foregoing document entitled (*specify*): **Stipulation between Plaintiffs and Blue Shield of California to Extend Response Date to Complaint**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) September 29, 2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Steven J Kahn** skahn@pszyjw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 29, 2020

Date

Kimberly A. Collins

Printed Name

/s/ Kimberly A. Collins

Signature